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*Plaintiffs' Co-Lead Counsel*  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**~~[PROPOSED]~~ ORDER APPROVING  
PARTICIPATING COUNSEL  
PERFORMING COMMON BENEFIT  
WORK RELATED TO PLAINTIFFS'  
RESPONSES TO DISCOVERY**

Judge: Hon. Vince Chhabria  
Courtroom: 4, 17th Floor

Before the Court is Co-Lead Counsel's request to engage other certain named Plaintiffs' retained counsel ("Participating Counsel") to perform Common Benefit Work related to responding to Defendants' written discovery to named Plaintiffs and anticipated depositions of named Plaintiffs, in accordance with Pretrial Order No. 8: Duties and Authority of Co-Lead Counsel, Dkt. 120, ¶ 17 and Pretrial Order No. 9: Protocol for Common Benefit Work and Expenses, Dkt. 121. Defendants do not object to this request.

Participating Counsel specifically consists of the following firms: Cohen Milstein Sellers & Toll PLLC; Gustafson Gluek PLLC; Hagens Berman Sobol Shapiro LLP; Motley Rice LLC;

Schonbrun Seplow Harris Hoffman & Zeldes, LLP; Sulaiman Law (Atlas Consumer Law); and Cuneo Gilbert & LaDuca, LLP.

The Court APPROVES the request, subject to the following requirements. Co-Lead Counsel may authorize Participating Counsel to assist in: (a) responding to Defendants' discovery requests for their clients; and (b) representing their clients in depositions, together with Co-Lead Counsel, subject to the limitation that only one attorney may object and conduct any direct examination during the course of such depositions. Such Participating Counsel may not perform Common Benefit Work other than that specifically requested by Co-Lead Counsel that is related to either (a) or (b) as set forth above. All work shall conform to the requirements for Common Benefit Work set forth in Pretrial Order No. 9, Dkt. 121. Participating Counsel's receipt of reasonable common benefit attorneys' fees and reimbursement of costs and expenses shall be subject to Section I of Pretrial Order No. 9, Dkt 121. As required by Pretrial Order No. 8, Dkt. 120, Co-Lead Counsel will: (a) manage and oversee the work of Participating Counsel; (b) sign all court filings and responses to discovery requests in accordance with the requirements of Rule 11; (c) ensure proper preservation, collection, and production of documents in response to any document demands, consistent with all applicable rules of procedure and ethical rules; (d) collect cost and time records from Participating Counsel; and (e) ensure that Participating Counsel's work adheres to the Court-approved protocol regarding attorneys' fees, expenses, and costs. Co-Lead Counsel is solely responsible for all case-related correspondence, email, and phone communications with Defendants.

IT IS SO ORDERED.

DATED: May 14, 2020

  
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 THE HONORABLE VINCE CHHABRIA  
 UNITED STATES DISTRICT COURT JUDGE